

## **EXHIBIT A**

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KATHLEEN VIGIL CLERK OF THE COURT  
Jessica E Castaneda

**STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT**

**JOLEEN YOUNGERS, as personal  
representative of the ESTATE OF  
JASMINE WILLIAMS; TONYA  
PETRIDES; and TONYA PETRIDES as  
next friend of M.R.,**

**Plaintiffs,**

**vs.**

**No.** D-101-CV-2024-02751  
Case assigned to Ellenwood, Kathleen McG

**CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC  
OF TENNESSEE, LLC; ROBERT NILIUS; WILLIAM  
SNODGRASS; OFFICER DEHIYA; OFFICER V.  
BECENTI; OFFICER F. CHINO; OFFICER JOSHUA  
ARAGON; OFFICER L. KENNETH; OFFICER K.  
BROWN; OFFICER DAVID COLE; OFFICER  
CHAVEZ; OFFICER SARRACINO; OFFICER  
HAYES; OFFICER DAVID ROBERTS;  
LIEUTENANT JARAMILLO; J. DOES 1–15;  
NATALIE GRINE, in her individual and official  
capacity as Cibola County’s records custodian; ANNA  
MARIE LOPEZ, in her individual and official capacity  
as Cibola County Sheriff’s Office’s records custodian;  
JACOB LEE, in his individual and official capacity as  
records custodian of the Cibola County, Cibola County  
Correctional Center, CoreCivic LLC, CoreCivic of  
Tennessee, LLC, CoreCivic, Inc.; and STRUCK LOVE  
BOJANOWSKI & ACEDO PLC,**

**Defendants.**

**COMPLAINT FOR WRONGFUL DEATH, SPOILIATION OF EVIDENCE, AND IPRA  
VIOLATIONS**

Plaintiffs Joleen Youngers, as personal representative of the Estate of Jasmine Williams;  
Tonya Petrides; and Tonya Petrides as next friend of M.R., through their counsel, Ives & Flores,  
PA (“Plaintiffs”), hereby bring this action for negligence; negligent operation of a building;  
negligent operation of custody and control; negligent hiring, retention, and supervision; losses of

consortium; negligence resulting in spoliation; intentional spoliation; conversion; aiding and abetting; prima facie tort; and IPRA violations.

The Cibola County Correctional Center (“CCCC”) is a privately-run detention center in Milan, NM, that houses inmates and detainees in federal and state custody. In recent years, this small facility has become notorious for drug trafficking. As an FBI Special Agent explained in a recent search warrant affidavit, the “sheer volume of controlled substances being trafficked withing the facility” makes the CCCC’s drug problem a “startling anomaly” among New Mexico’s detention centers.<sup>1</sup> The CCCC’s drug trade is so lucrative that traffickers regularly recruit corrections officers (“COs”) and other CCCC staff to help. COs are paid to smuggle in drugs, look the other way, or use their positions to destroy evidence and impede investigations. Traffickers also make use of the CCCC’s proximity to public roads, parking lots, and open spaces, smuggling drugs in by simply tossing contraband over a fence.

As drug use has become endemic to the CCCC, so have the overdoses. This action arises from Jasmine Williams’ fatal drug overdose while CCCC custody. On the morning of November 14, 2021, Ms. Williams was found unresponsive in her cell, dead from the toxic effects of fentanyl, methamphetamine, and morphine. By the time police investigators arrived, CCCC’s corrections officers and staff had compromised the scene of her death, leaving virtually nothing for law enforcement to investigate. Despite multiple public records requests and preservation letters, CCCC destroyed critical evidence, including video surveillance. The CCCC and Cibola County ignored multiple public records requests regarding inmate deaths and drug trafficking at CCCC.

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<sup>1</sup>See generally Press Release, *U.S. Attorney’s Office, FBI and USMS Target Drug Trafficking Operation Linked to Federal Correctional Facility*, U.S. Attorney’s Office District of New Mexico (Nov. 1, 2024), <https://www.justice.gov/usao-nm/pr/us-attorneys-office-fbi-and-usms-target-drug-trafficking-operation-linked-federal-0/>.

### **JURISDICTION AND VENUE**

1. The Court has jurisdiction over this action. *See* N.M. Const., art. VI, § 13; NMSA 1978, § 14-2-12(A)(2).

2. Venue is proper for this action, because Plaintiff Joleen Youngers, as personal representative of Jasmine Williams' wrongful-death estate, resides in Santa Fe County. *See* § 38-3-1(A).

### **PARTIES**

3. Plaintiff Joleen Youngers is the personal representative of Jasmine Williams' wrongful-death estate, pursuant to New Mexico's Wrongful Death Act, 1978, § 41-2-1 *et seq.* She was appointed on October 10, 2024. *See In the Matter of Jasmine Williams*, No. D-1333-CV-2024-00262.

4. Tonya Petrides is Jasmine Williams' mother.

5. M.R. is a minor child, Jasmine Williams' daughter, and Tonya Petrides' granddaughter.

6. CoreCivic, Inc. is a corporation doing business in New Mexico by owning and operating the CCCC in Milan, NM.

7. CoreCivic, LLC is a corporation doing business in New Mexico by owning and operating the CCCC in Milan, NM.

8. CoreCivic of Tennessee, LLC is a corporation doing business in New Mexico by owning and operating CCCC in Milan, NM.

9. Robert Nilius was, at the time of Ms. Williams' incarceration and death, the CCCC's Warden.



10. Captain William Snodgrass was, at the time of Ms. Williams' incarceration and death, a Captain and Shift Supervisor at the CCCC. Upon information and belief, Captain Snodgrass resides in New Mexico.

11. Officer Dehiya was, at the time of Ms. Williams' incarceration and death, a corrections officer at CCCC. Upon information and belief, Officer Dehiya resides in New Mexico.

12. Officer V. Becenti was, at the time of Ms. Williams' incarceration and death, a corrections officer at CCCC. Upon information and belief, Officer Becenti resides in New Mexico.

13. Officer F. Chino was, at the time of Ms. Williams' incarceration and death, a corrections officer at CCCC. Upon information and belief, Officer Chino resides in New Mexico.

14. Officer Joshua Aragon was, at the time of Ms. Williams' incarceration and death, a corrections officer at CCCC. Upon information and belief, Officer Aragon resides in New Mexico.

15. Officer L. Kenneth was, at the time of Ms. Williams' incarceration and death, a corrections officer at CCCC. Upon information and belief, Officer Kenneth resides in New Mexico.

16. Officer K. Brown was, at the time of Ms. Williams' incarceration and death, a corrections officer at the CCCC. Upon information and belief, Officer Brown resides in New Mexico.

17. Officer Hayes was, at the time of Ms. Williams' incarceration and death, chief of security at the CCCC. Upon information and belief, Officer Hayes resides in New Mexico.

18. Officer Chavez was, at the time of Ms. Williams' incarceration and death, a corrections officer and shift supervisor at the CCCC. Upon information and belief, Officer Chavez resides in New Mexico.

19. Officer Sarracino was, at the time of Ms. Williams' incarceration and death, a corrections officer and assistant shift supervisor at the CCCC. Upon information and belief, Officer Sarracino resides in New Mexico.

20. Officer David Cole was, at the time of Ms. Williams' incarceration and death, a corrections officer and investigator at the CCCC. Upon information and belief, Officer Cole resides in New Mexico.

21. Officer David Roberts was, at the time of Ms. Williams' incarceration and death, a corrections officer and investigator at the CCCC. Upon information and belief, Officer Roberts resides in New Mexico.

22. Lieutenant Jaramillo was, at the time of Ms. Williams' incarceration and death, a corrections officer and investigator at the CCCC. Upon information and belief, Lt. Jaramillo resides in New Mexico.

23. J. Does 1–15 are employees of the CCCC who worked before, during, and/or after Ms. Williams' incarceration.

24. Jacob Lee was, at all relevant times, the records custodian for Cibola County, Cibola County Correctional Center, CoreCivic of Tennessee, LLC, and CoreCivic, Inc.

25. Struck Love Bojanowski & Acedo, PLC ("Struck Love"), is a law firm based in Arizona that does business in New Mexico. At all relevant times, Struck Love employed Jacob Lee.

26. Natalie Grine was, at all relevant times, the records custodian for Cibola County. Upon information and belief, Ms. Grine resides in New Mexico.

27. Anna Marie Lopez was, at all relevant times, the records custodian for Cibola County Sheriff's Office ("CCSO"). Upon information and belief, Ms. Lopez resides in New Mexico.

### **FACTS**

#### **The Cibola County Correctional Center**

28. The CCCC is a detention facility in Cibola County that is owned and operated by CoreCivic, Inc.; CoreCivic, LLC; and CoreCivic of Tennessee, LLC..

29. The CCCC houses inmates and detainees in custody of Cibola County, the US Marshals Service, and U.S. Immigration and Customs Enforcement.

30. In recent years, the CCCC has become notorious for violence, drug use, and drug trafficking.

31. The CCCC's problems with violence and drugs became so severe and widely known within the federal criminal justice system that the US Marshals Service and federal judges in the District of New Mexico brought their concerns to the US Attorneys' Office and the FBI.

32. The FBI Albuquerque Division Violent Gang Task Force investigated the CCCC and uncovered a complex and lucrative drug trade market operating within the CCCC.

33. For years, members of prison gangs at the CCCC had been working with outside accomplices and CCCC employees to smuggle drugs and other contraband into the facility.

34. According to a search warrant affidavit, FBI Special Agent Jordan Spaeth found that the "sheer volume of controlled substances being trafficked within the facility" made the CCCC's drug problem a "startling anomaly" among New Mexico's detention centers.

35. One common method for introducing drugs into the CCCC is the "throw over": smugglers throw or use slingshots to launch contraband over the facility's perimeter fence into the recreational yard, where inmates and detainees can recover the packages.

36. The CCCC's proximity to public roads, parking lots, and open spaces makes the CCCC particularly vulnerable this technique. Just north of the facility are parking lots for a truck stop and Indian restaurant; to the southeast is a large ravine. Smugglers are able to get as close as 15 feet of the CCCC's outer fence to throw or launch contraband into the facility and leave without being detected.

37. The CCCC appears to foil this technique only when the smugglers make their effort too obvious to ignore. For instance, one morning in March 2021, COs supervising inmates in the recreation yard watched as several tennis balls flew over a fence and landed in the recreation yard. A CO grabbed most of the tennis balls (containing methamphetamine, heroin, and suboxone), but one ball burst open and scattered its contents across the yard (which inmates recovered). Video surveillance showed a man drive up to the fence from a nearby parking lot, lob the balls over the fence, and depart without being caught or identified.

38. Later in 2021, Milan Police Department arrested a man for throwing a tennis ball full of drugs into the CCCC. Neither the CCCC nor the MPD would have caught the man (or, perhaps, known about the tennis ball at all) had he not approached a CO to ask for help retrieving it: he had apparently not thrown the ball far enough for an accomplice to recover it.

39. CCCC's own employees are responsible for much of the drugs and contraband introduced into the CCCC.

40. In recent years, numerous COs have been caught smuggling drugs into the CCCC.

41. In 2018, a CCCC corrections officer confessed to smuggling drugs into the facility. She told investigators she acted on behalf of a prison gang who paid her as little as \$500.00 for each package. She explained she needed the extra money because she was on the brink of losing her home.

42. In 2021, CCCC's Corrections Officer Dennis Garcia was caught bringing 100 grams of methamphetamine into the CCCC and leaving the drugs for an inmate to pick up.<sup>2</sup>

43. Over twenty confidential human sources told FBI investigators that corrupt COs regularly smuggled drugs and other contraband into the CCCC for inmates. Some COs smuggled drugs in on a weekly basis. COs would also give inmates advanced warning of searches.

44. One confidential source knew of a CO who brought drugs into the facility hidden in his boot. The CO would deliver the drugs to a particular inmate by dropping the package in the inmates' cell while pretending to search it. Because surveillance cameras could not see into the cells, the CO knew he would only be recorded entering and exiting the cell.

45. FBI investigators learned that a former CCCC corrections officer who had obtained the rank of Captain and Shift Supervisor had been actively involved in the facility's drug trade. The Captain had allegedly assembled a roster of inmate porters whom he helped distribute drugs throughout the facility. When other COs discovered evidence of drugs in an inmates' cell, the Captain instructed the COs to not field test the drugs and then he deleted photo and video evidence of the drugs.

46. FBI investigators learned that the CCCC's drug trade was so lucrative compared to the COs' modest salaries that a CO who smuggled drugs every few days could earn twice their annual salary in a single month.

47. Once inside the CCCC, drugs and other contraband are distributed to other inmates and detainees by staff or by inmates. One method for delivering drugs and other contraband

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<sup>2</sup>See generally Press Release, *Former corrections officer arraigned on drug trafficking and contraband charges*, U.S. Attorney's Office District of New Mexico (Feb. 3, 2022), <https://www.justice.gov/usao-nm/pr/former-corrections-officer-arraigned-drug-trafficking-and-contraband-charges>.

between pods is by inmates concealing the contraband inside food carts. The CCCC permits inmates and detainees to move essentially freely among the pods, delivering unsecured or unlocked food carts from pod to pod without supervision.

48. The most common drugs trafficked in the CCCC are methamphetamine, Suboxone, and fentanyl.

49. Methamphetamine and fentanyl are dangerous. In recent years, numerous inmates, detainees, and even corrections officers have been hospitalized and treated for drug overdoses.

50. In June 2021, a CCCC detainee was found dead in his cell. Although no evidence of drug use were reported found nearby, the Office of Medical Investigator determined he died from toxic effects of fentanyl, methamphetamine, and morphine.

51. On May 29, 2024, two inmates and three COs were hospitalized and treated for drug overdoses.

#### **Jasmine Williams**

52. In late March 2021, agents with the Drug Enforcement Administration arrested Jasmine Williams at Albuquerque's Greyhound bus depot on suspicion of possessing with the intent to distribute methamphetamine.

53. Ms. Williams immediately began cooperating with prosecutors on a plea agreement.

54. The Hon. Judge Fashing ordered that Ms. Williams be placed on supervised release once a spot opened at a halfway house.

55. Ms. Williams spent 90 days at the CCCC before being released to the halfway house.



56. As a condition of her release, Ms. Williams was ordered to report for supervision by the United States Pretrial and Probation Services office, to maintain residency at the halfway house, to not use any alcohol or drugs, and to submit to drug testing.

57. Ms. Williams complied with those terms. While staying at the halfway house, Ms. Williams obeyed the law, did not take any drugs, and passed numerous drug tests.

58. On July 27, 2021, Ms. Williams entered a plea agreement in which she pleaded guilty to one count of possessing methamphetamine with intent to distribute, in violation of 21 U.S.C. §§ 831(A)(1) and (b)(1)(C).

59. The Hon. Chief Judge William P. Johnson sentenced Ms. Williams to 13 months imprisonment followed by three years of supervised release.

60. Although the federal sentencing guidelines called for a significantly longer sentence, Judge Johnson imposed a 13-month sentence in light of Ms. Williams' cooperation with federal authorities.

61. Because Ms. Williams had complied with the conditions of her supervised release, Judge Johnson authorized Ms. Williams to self-surrender to the US Marshals Service.

62. On Friday, November 12, 2021, Ms. Williams voluntarily surrendered to the USMS to begin serving her 13-month sentence.

63. She was booked back into the CCCC that same day.

64. Ms. Williams looked forward to completing her prison sentence so she could return to her home where she lived with her mother, Tonya Petrides, and her daughter M.R., who was then six years old.

65. Officer F. Chino searched Ms. Williams.



66. On Saturday, November 13, 2021, Officer Aragon met with Ms. Williams and conducted an initial screening and custody classification.

67. Officer Aragon noted that Ms. Williams' co-defendant – with whom she had just pleaded guilty to conspiring – was also detained in the CCCC.

68. Around 8:30am on November 14, 2021, another detainee noticed that Ms. Williams was sitting slumped over on her bed and did not respond to her name being called. The detainee informed COs that Ms. Williams needed help.

69. COs and medical staff responded but Ms. Williams was dead.

70. According to the Office of Medical Investigator report, Ms. Williams died from the toxic effects of fentanyl, methamphetamine, and morphine.

71. According to log records, Captain Snodgrass took photos of the scene.

72. No one called law enforcement until hours later.

73. By the time an investigator from the Milan Police Department (“MPD”) arrived, the investigator found little to investigate.

74. In his report, the MPD investigator noted that by the time he arrived, the “scene was compromised and the deceased was already placed in a body bag.”

75. Captain Snodgrass told the MPD investigator about surveillance footage of Ms. Williams' pod, but did not provide the MPD investigator with a copy of the footage nor did he take any steps to preserve it.

76. Captain Snodgrass promised the MPD investigator that the CCCC would investigate the incident and would forward that report to MPD.

77. Captain Snodgrass' report did not include any investigation, conclusions, or any inquiry about how Ms. Williams obtained the drugs that killed her.

78. Captain Snodgrass' report did not include any images or videos.

**The CCCC Defendants**

79. The CoreCivic Corporate Defendants and Defendants Robert Nilius, Snodgrass, and J. Does 1–15 were responsible for setting, ratifying, and implementing policies and practices for preventing drug trafficking within the CCCC.

80. The CoreCivic Corporate Defendants and Defendants Robert Nilius, Snodgrass, and J. Does 1–15 were responsible for hiring, training, and supervising the CCCC's staff and COs.

81. Defendants Hayes, Cole, Roberts, Jaramillo, Snodgrass, Sarracino, and J. Does 1–15 were employed as supervisors and/or investigators at the CCCC before and during Ms. Williams' incarceration at the CCCC. Among their duties was to prevent dangerous contraband drugs from being distributed to inmates and detainees.

82. Defendants Cole, Becenti, Dehiya, Chino, Aragon, and J. Does 1–15 directly interacted with Ms. Williams and/or entered her housing pod while she was incarcerated at the CCCC before she died.

83. Defendants Dehiya, Becenti, Kenneth, Brown, Snodgrass, and J. Does 1–15 were around or inside Ms. Williams' cell after her death but before MPD arrived.

84. Defendants Snodgrass and J. Does 1–15 were on duty as shift supervisors the night that Ms. Williams died.

85. Upon information and belief, Ms. Williams died by overdosing on illegal drugs that one or more of the CoreCivic Individual Defendants smuggled, assisted in smuggling, or otherwise allowed to be smuggled into the CCCC.

86. Upon information and belief, Ms. Williams died by overdosing on illegal drugs that Defendants Cole, Becenti, Dehiya, Chino, Aragon, and/or J. Does 1–15 assisted in providing or directly provided to Ms. Williams.

87. Upon information and belief, Defendants Dehiya, Becenti, Kenneth, Brown, Snodgrass, and/or J. Does 1–15 concealed or destroyed evidence of Ms. Williams’ receipt and consumption of the drugs that killed her.

### **Spoliation**

88. On November 18, 2021 – four days after Ms. Williams’ death – Plaintiffs’ counsel sent an IPRA request to the CCCC, Struck Love, Jacob Lee, and Cibola County for records relating to Ms. Williams’ incarceration and death. The request sought video and audio records related to Ms. Williams’ death, and all video from Ms. Williams’ housing unit.

89. On December 9, 2021 – 25 days after Ms. Williams’ death – Plaintiffs’ counsel sent the CCCC, Struck Love, and Jacob Lee a letter demanding that they preserve records relating to Ms. Williams and her death. In that letter, Plaintiffs’ counsel stated that those records will be relevant to potential litigation.

90. The preservation letter specifically identified the duty to preserve audio and video recording “capturing Jasmine Williams, her cell, or any response to her death or medical emergency between November 12 and November 14, 2021,” and any “evidence that you or any of your agents collected in response to Jasmine Williams’ death.”

91. The preservation letter directed the CCCC, Struck Love, and Jacob Lee “to suspend your ordinary information management and retention/destruction practices, and to notify legal counsel and key personnel to put a litigation hold on the materials described herein.”

92. On December 22, 2021, the CCCC, Struck Love, and Jacob Lee responded to the Nov. 18 IPRA request by producing a 41-minute-long video (8:23AM to 9:03AM on November 14, 2021) showing the medical response to Ms. Williams.

93. On January 20, 2022, the CCCC, Struck Love, and Jacob Lee provided a seven-minute-long video (from 12:13PM to 12:20PM) showing Ms. Williams' body being removed from her cell.

94. On April 27, 2022, Plaintiffs submitted a second IPRA request to the CCCC, Struck Love, Jacob Lee, and Cibola County asking for “[a]ll video recordings of Jasmine Nicole Williams and/or Unit 400-Bravo, Cell 204 between 9:00 a.m. on November 13, 2021 and 9:00 a.m. November 14, 2021.”

95. On April 28, 2022, the CCCC, Struck Love, and Jacob Lee responded to Plaintiffs' first IPRA request (sent on Nov. 18, 2021) by stating:

CoreCivic is not in possession of any additional video responsive to your request. Video from CCCC's surveillance camera system is automatically overwritten within approximately 30 days unless it is burned to a disc, external hard drive, or other storage medium for preservation. The videos CoreCivic previously produced in response to your last request constitute all of the video that was preserved with respect to Williams's death on November 14, 2021.

96. According to the CCCC's written policies, however, surveillance footage must be preserved for 90 days.

97. On May 2, 2022, Plaintiffs' counsel wrote to the CCCC, Struck Love, and Jacob Lee asking them to confirm that they failed to preserve those records despite receiving Plaintiffs' Nov. 18, 2021 IPRA request and Plaintiffs' Dec. 9, 2021 preservation letter.

98. On May 10, 2022, the CCCC, Struck Love, and Jacob Lee responded that “CoreCivic is not in possession of any additional video regarding Williams, and all available video has been produced.”

99. The CCCC, Struck Love, and Jacob Lee did not provide copies of any photographs taken in the course of investigating Ms. Williams' death.

**Nov. 10, 2022 IPRA Request to Cibola County**

100. On November 10, 2022, Plaintiffs sent an IPRA request to Natalie Grine, records custodian for the Cibola County, seeking Cibola County Sheriff's Office ("CCSO") records from 2015 to the present regarding any incidents at the CCCC involving a detainee death or illegal drugs.

101. Ms. Grine forwarded the request to Anna Marie Lopez at the CCSO.

102. As of this filing, neither Ms. Grine, Ms. Lopez, nor any other Cibola County employee has responded to this request with responsive records or any other updates.

**April 21, 2023 IPRA Request to the CCCC**

103. On April 21, 2023, Plaintiffs' counsel submitted another IPRA request to the CCCC, Struck Love, Jacob Lee, and Cibola County asking for records of incidents at the CCCC from 2015 to 2022 involving illegal substances.

104. On April 24, 2023, Ms. Grine responded that the County had no responsive records, and that all responsive records were in the custody and control of the CCCC, Struck Love, and Jacob Lee.

105. On May 8, 2023, the CCCC, Struck Love, and Jacob Lee responded that the request was "overly burdensome and broad."

106. The CCCC, Struck Love, and Jacob Lee have not produced any responsive records or provided any other updates since May 8, 2023.

**COUNT 1: NEGLIGENCE**

**(Against the CoreCivic Corporate Defendants<sup>3</sup> and the CoreCivic Individual Defendants<sup>4</sup>)**

107. Plaintiffs incorporate the preceding paragraphs herein.

108. The CoreCivic Corporate Defendants and the CoreCivic Individual Defendants had a duty to exercise reasonable care to protect Ms. Williams from harm, including harm from dangerous drugs.

109. The CoreCivic Corporate Defendants and the CoreCivic Individual Defendants breached that duty by allowing, failing to stop, and/or facilitating the smuggling of dangerous drugs that killed Ms. Williams into the CCCC.

110. The CoreCivic Corporate Defendants' and the CoreCivic Individual Defendants' negligence actually and proximately caused Ms. Williams' suffering and death by overdose.

111. The CoreCivic Corporate Defendants' and the CoreCivic Individual Defendants' wrongful actions were willful, wanton, malicious, reckless, oppressive, or fraudulent and in bad faith.

112. The CoreCivic Corporate Defendants are liable for their employees' negligence.

WHEREFORE Plaintiff Youngers, as personal representative of Jasmine Williams' wrongful-death estate, is entitled to actual and punitive damages for Ms. Williams' pain, suffering, and wrongful death caused by CoreCivic Corporate Defendants' and the CoreCivic Individual Defendants' negligence.

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<sup>3</sup>In this count and others, "CoreCivic Corporate Defendants" refer to Defendants CoreCivic, Inc.; CoreCivic, LLC; and CoreCivic of Tennessee, LLC.

<sup>4</sup>In this count and others, "CoreCivic Individual Defendants" refer to Defendants Warden Nilius, Captain Snodgrass, Officer Dehiya, Officer Becenti, Officer F. Chino, Officer Kenneth, Officer Aragon, Officer Brown, Officer Hayes, Officer Chavez, Officer Sarracino, Officer Cole, Officer Roberts, Lieutenant Jaramillo, and J. Does 1–15.



**COUNT 2: NEGLIGENT OPERATION OF A BUILDING**

**(Against the CoreCivic Corporate Defendants and CoreCivic Individual Defendants)**

113. Plaintiffs incorporate the preceding paragraphs herein.

114. The CoreCivic Corporate Defendants and the CoreCivic Individual Defendants had actual and/or constructive knowledge that the CCCC's proximity to public spaces as well as their policies, practices, and procedures in staffing and operating the CCCC created a dangerous condition for inmates and detainees like Ms. Williams by giving inmates easy access to dangerous drugs.

115. The CoreCivic Corporate Defendants and the CoreCivic Individual Defendants had actual and/or constructive knowledge that their policies, practices, and procedures in staffing and operating the CCCC created a dangerous condition for inmates and detainees like Ms. Williams by not monitoring inmates or detainees closely or frequently enough to render medical aid in time to an overdosing inmate or detainee.

116. Those dangerous conditions each posed an unreasonable risk of harm to the CCCC's detainees and inmates like Ms. Williams.

117. The CoreCivic Corporate Defendants and the CoreCivic Individual Defendants did not exercise reasonable care to reduce or eliminate those risks.

118. The CoreCivic Corporate Defendants' and the CoreCivic Individual Defendants' actually and proximately caused Ms. Williams' suffering and death by overdose.

119. The CoreCivic Corporate Defendants' and the CoreCivic Individual Defendants' wrongful actions were willful, wanton, malicious, reckless, oppressive, or fraudulent and in bad faith.

120. The CoreCivic Corporate Defendants are liable for their employees' negligence.



WHEREFORE Plaintiff Youngers, as personal representative of Jasmine Williams' wrongful-death estate, is entitled to actual and punitive damages for Ms. Williams' pain, suffering, and wrongful death caused by CoreCivic Corporate Defendants' and CoreCivic Individual Defendants' negligent operation of a building.

**COUNT 3: NEGLIGENT EXERCISE OF CUSTODY AND CONTROL**

**(Against the CoreCivic Corporate Defendants and the CoreCivic Individual Defendants)**

121. Plaintiffs incorporate the preceding paragraphs herein.

122. The CoreCivic Corporate Defendants and the CoreCivic Individual Defendants exercised custody and control over the CCCC's inmates and detainees, including Ms. Williams.

123. The CoreCivic Corporate Defendants and the CoreCivic Individual Defendants had the ability to control their employees.

124. The CoreCivic Corporate Defendants and the CoreCivic Individual Defendants breached that duty by allowing Ms. Williams to access, consume, and overdose on dangerous drugs while she was incarcerated.

125. The CoreCivic Corporate Defendants' and the CoreCivic Individual Defendants' negligence actually and proximately caused Ms. Williams' suffering and death by overdose.

126. The CoreCivic Corporate Defendants' and the CoreCivic Individual Defendants' wrongful actions were willful, wanton, malicious, reckless, oppressive, or fraudulent and in bad faith.

127. The CoreCivic Corporate Defendants are liable for their employees' negligence.

WHEREFORE Plaintiff Youngers, as personal representative of Jasmine Williams' wrongful-death estate, is entitled to actual and punitive damages for Ms. Williams' pain, suffering, and wrongful death caused by CoreCivic Corporate Defendants' and CoreCivic Individual Defendants' negligent exercise of custody and control.

**COUNT 4: NEGLIGENT HIRING, RETENTION, AND SUPERVISION**

**(Against the CoreCivic Corporate Defendants,  
Nilius, Snodgrass, Saracino, and J. Does 1–15)**

128. Plaintiffs incorporate the preceding paragraphs herein.

129. CoreCivic Corporate Defendants and Defendants Nilius, Snodgrass, Saracino, and J. Does 1–15 had a duty to exercise reasonable care towards their detainees and inmates like Ms. Williams when hiring, retaining, and supervising their employees.

130. CoreCivic Corporate Defendants and Defendants Nilius, Snodgrass, Saracino, and J. Does 1–15 breached that duty by hiring, retaining, and failing to supervise the CoreCivic employees who allowed, failed to stop, and/or facilitated the smuggling of dangerous drugs to Ms. Williams.

131. CoreCivic Corporate Defendants and Defendants Nilius, Snodgrass, Saracino, and J. Does 1–15 also breached that duty by hiring, retaining, and failing to supervise the CoreCivic employees who failed to monitor Ms. Williams closely or frequently enough to render medical aid in time.

132. The CoreCivic Corporate Defendants and Defendants Nilius, Snodgrass, Saracino, and J. Does 1–15 actually and proximately caused Ms. Williams' suffering and death by overdose.

133. The CoreCivic Corporate Defendants' and Defendants Nilius', Snodgrass', Saracino's, and J. Does 1–15's wrongful actions were willful, wanton, malicious, reckless, oppressive, or fraudulent and in bad faith.

134. The CoreCivic Corporate Defendants are liable for their employees' negligence.

WHEREFORE Plaintiff Youngers, as personal representative of Jasmine Williams' wrongful-death estate, is entitled to actual and punitive damages for Ms. Williams' pain, suffering,

and wrongful death caused by CoreCivic Corporate Defendants' and CoreCivic Individual Defendants' negligent hiring, retention, and supervision.

**COUNT 5: TONYA PETRIDES' LOSS OF CONSORTIUM AND EMOTIONAL DAMAGES**

**(Against the CoreCivic Corporate Defendants and the CoreCivic Individual Defendants)**

135. Plaintiffs incorporate the preceding paragraphs herein.

136. Tonya Petrides had a close, mutually-dependent relationship with her daughter Jasmine Williams.

137. That relationship was damaged by Ms. Williams' wrongful death, resulting in Tonya Petrides suffering loss of consortium and emotional damages arising from that loss of consortium.

138. The CoreCivic Corporate Defendants and the CoreCivic Individual Defendants owed a duty of care to Ms. Petrides because it was foreseeable that Ms. Williams' wrongful death would damage her close relationship with her mother.

139. The CoreCivic Corporate Defendants are liable for their employees' negligence.

WHEREFORE Plaintiff Tonya Petrides is entitled to damages for loss of consortium and emotional damages arising from that loss of consortium caused by the CoreCivic Corporate Defendants' and the CoreCivic Individual Defendants' negligence.

**COUNT 6: M.R.'S LOSS OF CONSORTIUM, GUIDANCE, AND COUNSELING**

**(Against the CoreCivic Corporate Defendants and the CoreCivic Individual Defendants)**

140. Plaintiffs incorporate the preceding paragraphs herein.

141. M.R. had a close, mutually-dependent relationship with her mother, Jasmine Williams.

142. That relationship was damaged by Ms. Williams' wrongful death, resulting in M.R. suffering loss of consortium, loss of guidance, and loss of counseling.

143. The CoreCivic Corporate Defendants and the CoreCivic Individual Defendants owed a duty of care to M.R. because it was foreseeable that Ms. Williams' wrongful death would damage M.R.'s relationship with her mother.

144. The CoreCivic Corporate Defendants are liable for their employees' negligence.

WHEREFORE, Plaintiff M.R. is entitled to damages for loss of consortium, loss of guidance, loss of counseling, and emotional damages arising from those losses caused by the CoreCivic Corporate Defendants' and the CoreCivic Individual Defendants' negligence.

**COUNT 7: NEGLIGENCE (SPOLIATION)**

**(Against the CoreCivic Corporate Defendants, the CoreCivic Individual Defendants, Struck Love, and Jacob Lee)**

145. Plaintiffs incorporate the preceding paragraphs herein.

146. The CoreCivic Corporate Defendants, CoreCivic Individual Defendants, Struck Love, and Jacob Lee owed a duty of reasonable care to Plaintiffs to preserve records of Ms. Williams' incarceration and death.

147. These defendants breached that duty by destroying or failing to preserve records of Ms. Williams' incarceration and death, including video footage.

148. These defendants' wrongful actions were willful, wanton, malicious, reckless, oppressive, or fraudulent and in bad faith.

149. As a result of their breach of this duty, these defendants caused Plaintiffs harm, including by impeding Plaintiffs' ability to recover damages in a wrongful-death lawsuit.

WHEREFORE Plaintiff Youngers, as personal representative of Jasmine Williams' wrongful-death estate, is entitled to actual and punitive damages for the CoreCivic Corporate

Defendants', the CoreCivic Individual Defendants', Struck Love's, and Jacob Lee's negligence resulting in evidence spoliation.

**COUNT 8: INTENTIONAL SPOILIATION OF EVIDENCE**

**(Against the CoreCivic Corporate Defendants, CoreCivic Individual Defendants, Struck Love, and Jacob Lee)**

150. Plaintiffs incorporate the preceding paragraphs herein.

151. The CoreCivic Corporate Defendants, CoreCivic Individual Defendants, Struck Love, Jacob Lee, and J. Does 1–15 knew of the existence of a potential lawsuit regarding Ms. Williams' death.

152. These defendants destroyed evidence relevant to that lawsuit, including by destroying or failing to preserve that evidence.

153. These defendants destroyed or failed to preserve that evidence with the intention to disrupt or defeat a lawsuit for Ms. Williams' wrongful death.

154. These defendants' destruction or failure to preserve that evidence has impeded or prevented Plaintiff from prevailing on a wrongful death lawsuit.

155. These defendants' wrongful actions were willful, wanton, malicious, reckless, oppressive, or fraudulent and in bad faith.

WHEREFORE Plaintiff Youngers, as personal representative of Jasmine Williams' wrongful-death estate, is entitled to actual and punitive damages for the CoreCivic Corporate Defendants', the CoreCivic Individual Defendants', Struck Love's, Jacob Lee's, and J. Does 1–15's intentional spoliation of evidence.

**COUNT 9: CONVERSION**

**(Against the CoreCivic Corporate Defendants, the CoreCivic Individual Defendants, Struck Love, and Jacob Lee)**

156. Plaintiffs incorporate the preceding paragraphs herein.

157. Plaintiffs had a right to possess records of Ms. Williams' incarceration and death.

158. The CoreCivic Corporate Defendants, CoreCivic Individual Defendants, Defendants Struck Love and Jacob Lee, and J. Does 1–15 made unauthorized and injurious use of Plaintiff's property by destroying, altering, and/or failing to preserve records related to Ms. Williams' incarceration and death.

WHEREFORE Plaintiffs are entitled to actual damages for CoreCivic Corporate Defendants', CoreCivic Individual Defendants', Defendants Struck Love's, Jacob Lee's, and J. Does 1–15's conversion of records of Ms. Williams' incarceration and death.

**COUNT 10: AIDING AND ABETTING TORT LIABILITY**

**(Against Struck Love and Jacob Lee)**

159. Plaintiffs incorporate the preceding paragraphs herein.

160. Struck Love and Jacob Lee knew that the CoreCivic Corporate Defendants, the CoreCivic Individual Defendants, and J. Does 1–15 possessed records relating to Ms. Williams' incarceration and death that (i) Plaintiffs had a right to possess; (ii) would be relevant to potential litigation; and/or (iii) the CoreCivic Corporate Defendants, CoreCivic Individual Defendants, and J. Does 1–15 owed a duty to Plaintiffs to preserve.

161. Struck Love and Jacob Lee intentionally provided substantial assistance or encouragement to the CoreCivic Corporate Defendants, CoreCivic Individual Defendants, and J. Does 1–15.

162. Struck Love's and Jacob Lee's substantial assistance or encouragement harmed Plaintiff.

163. Struck Love's and Jacob Lee's wrongful actions were willful, wanton, malicious, reckless, oppressive, or fraudulent and in bad faith.



WHEREFORE Plaintiff Youngers, as personal representative of Jasmine Williams' wrongful-death estate, is entitled to actual and punitive damages for Struck Love's and Jacob Lee's aiding and abetting tort liability.

**COUNT 11: PRIMA FACIE TORT**

**(Against Struck Love and Jacob Lee)**

164. Plaintiffs incorporate the preceding paragraphs herein.

165. Struck Love and Jacob Lee intentionally took no timely action to ensure that the CCCC preserved all records related to Ms. Williams' incarceration and death despite receiving Plaintiff's Nov. 18, 2021 IPRA request and/or despite receiving Plaintiffs' Dec. 9, 2021 preservation letter.

166. Struck Love and Jacob Lee intended to harm Plaintiffs by taking no timely action to preserve those records.

167. Plaintiff suffered an injury as a result of those intentional acts.

168. There was no sufficient justification for Struck Love's and Jacob Lee's injurious acts.

169. Struck Love's and Jacob Lee's wrongful actions were willful, wanton, malicious, reckless, oppressive, or fraudulent and in bad faith.

WHEREFORE Plaintiff Youngers, as personal representative of Jasmine Williams' wrongful-death estate, is entitled to actual and punitive damages for Struck Love's and Jacob Lee's prima facie tort.

**COUNT 12: IPRA VIOLATIONS FOR PLAINTIFF'S NOV. 10, 2022 IPRA REQUEST**

**(Against Natalie Grine and Anna Marie Lopez in their Official and Individual Capacities as Records Custodians)**

170. Plaintiffs incorporate the preceding paragraphs herein.



171. Plaintiffs requested public records of CCSO's investigations into or responses to reports of inmate or detainee deaths and/or reports of illegal drugs at the CCCC.

172. Records of the CCSO's investigations into or responses to matters occurring at the CCCC are public records under New Mexico's IPRA. See § 14-2-6(G), (H) ("public records" means all documents, papers, letters, books, maps, tapes, photographs, recordings and other materials, regardless of physical form or characteristics, that are used, created, received, maintained or held by or on behalf of any public body and relate to public business").

173. Natalie Grine and Anna Marie Lopez failed to produce any records responsive to this request or claim any exemptions as a basis for withholding these public records.

WHEREFORE, for Natalie Grine's and Anna Marie Lopez's IPRA violations regarding Plaintiff's Nov. 10, 2022 IPRA request, Plaintiffs are entitled to statutory damages of up to \$100.00 per day, pursuant to Section 14-2-11(C); and actual damages, costs, and attorneys' fees, pursuant to Section 14-2-12(D).

**COUNT 13: IPRA VIOLATIONS FOR PLAINTIFF'S APRIL 21, 2023 IPRA REQUEST**

**(Against Jacob Lee and Natalie Grine, in their Official and Individual Capacities as Records Custodians)**

174. Plaintiffs incorporate the preceding paragraphs herein.

175. On April 21, 2023, Plaintiffs requested from the CoreCivic Defendants and Cibola County all records of the CCCC's investigations into and responses to reports of deaths and/or illegal drugs.

176. Records of inmate deaths and illegal drugs at the CCCC are public records under IPRA, because CoreCivic Defendants incarcerate inmates and detainees on behalf of Cibola County. See § 14-2-6(G), (H) ("public records" means all documents, papers, letters, books, maps, tapes, photographs, recordings and other materials, regardless of physical form or characteristics,

that are used, created, received, maintained or held by or on behalf of any public body and relate to public business”).

177. Cibola County and Natalie Grine produced no responsive records, but stated that responsive records are in the custody of the CoreCivic Defendants and Defendants Struck Love and Jacob Lee.

178. To date, Cibola County, Natalie Grine, the CoreCivic Defendants, Defendants Struck Love and Jacob Lee have failed to produce any responsive records or assert any exemptions for withholding these public records.

WHEREFORE, for Jacob Lee’s and Natalie Grine’s IPRA violations regarding Plaintiffs’ April 21, 2023 IPRA request, Plaintiffs are entitled to statutory damages of up to \$100.00 per day, pursuant to Section 14-2-11(C); and actual damages, costs, and attorneys’ fees, pursuant to Section 14-2-12(D).

Respectfully submitted,

IVES & FLORES, PA

/s/ Henry A. Jones

Laura Schauer Ives  
Adam C. Flores  
Alyssa Quijano  
Henry A. Jones  
Andrew Pavlides  
925 Luna Cir. NW  
Albuquerque, NM 87102  
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alyssa.q@nmcivilrights.com  
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andrew@nmcivilrights.com

*Attorneys for Plaintiffs*

FILED 1st JUDICIAL DISTRICT COURT  
Santa Fe County  
11/25/2024 2:57 PM  
KATHLEEN VIGIL CLERK OF THE COURT  
Jill Nohl

**STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT COURT**

**JOLEEN YOUNGERS, as personal  
representative of the ESTATE OF  
JASMINE WILLIAMS; TONYA  
PETRIDES; and TONYA PETRIDES as  
next friend of M.R.,**

**Plaintiffs,**

**vs.**

**No. D-101-CV-2024-02751**

**CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC  
OF TENNESSEE, LLC; ROBERT NILIUS; WILLIAM  
SNODGRASS; OFFICER DEHIYA; OFFICER V.  
BECENTI; OFFICER F. CHINO; OFFICER JOSHUA  
ARAGON; OFFICER L. KENNETH; OFFICER K.  
BROWN; OFFICER DAVID COLE; OFFICER  
CHAVEZ; OFFICER SARRACINO; OFFICER  
HAYES; OFFICER DAVID ROBERTS;  
LIEUTENANT JARAMILLO; J. DOES 1–15;  
NATALIE GRINE, in her individual and official  
capacity as Cibola County’s records custodian; ANNA  
MARIE LOPEZ, in her individual and official capacity  
as Cibola County Sheriff’s Office’s records custodian;  
JACOB LEE, in his individual and official capacity as  
records custodian of the Cibola County, Cibola County  
Correctional Center, CoreCivic LLC, CoreCivic of  
Tennessee, LLC, CoreCivic, Inc.; and STRUCK LOVE  
BOJANOWSKI & ACEDO PLC,**

**Defendants.**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that Plaintiffs served a copy of the Complaint for Wrongful Death, Spoliation of Evidence, and IPRA Violations; a summons; Plaintiff’s First Set of Interrogatories to Defendants CoreCivic, LLC, CoreCivic, Inc., and CoreCivic of Tennessee; and Plaintiff’s First Set of Requests for Production to Defendants CoreCivic, Inc., CoreCivic, LLC, CoreCivic of Tennessee; and a copy of this certificate of service via USPS First Class Certified Mail on November 25, 2024 to the following defendants:

CoreCivic, Inc.  
C/o Kennedy Moulton & Wells, PC  
2201 San Pedro NE Building 3 Suite #200  
Albuquerque, NM 87110

CoreCivic, LLC  
C/o Kennedy Moulton & Wells, PC  
2201 San Pedro NE Building 3 Suite #200  
Albuquerque, NM 87110

CoreCivic of Tennessee  
C/o Kennedy Moulton & Wells, PC  
2201 San Pedro NE Building 3 Suite #200  
Albuquerque, NM 87110

Respectfully submitted,

**IVES & FLORES, PA**

/s/ Henry A. Jones

Laura Schauer Ives

Adam C. Flores

Alyssa Quijano

Henry A. Jones

Andrew Pavlides

925 Luna Cir. NW

Albuquerque, NM 87102

(505) 364-3858

[laura@nmcivilrights.com](mailto:laura@nmcivilrights.com)

[adam@nmcivilrights.com](mailto:adam@nmcivilrights.com)

[alyssa.q@nmcivilrights.com](mailto:alyssa.q@nmcivilrights.com)

[henry@nmcivilrights.com](mailto:henry@nmcivilrights.com)

[andrew@nmcivilrights.com](mailto:andrew@nmcivilrights.com)

*Attorneys for Plaintiffs*

FILED 1st JUDICIAL DISTRICT COURT  
Santa Fe County  
11/26/2024 10:44 AM  
KATHLEEN VIGIL CLERK OF THE COURT  
Mayra Mendoza-Gutierrez

**STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT COURT**

**JOLEEN YOUNGERS, as personal  
representative of the ESTATE OF  
JASMINE WILLIAMS; TONYA  
PETRIDES; and TONYA PETRIDES as  
next friend of M.R.,**

**Plaintiffs,**

**vs.**

**No. D-101-CV-2024-02751**

**CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC  
OF TENNESSEE, LLC; ROBERT NILIUS; WILLIAM  
SNODGRASS; OFFICER DEHIYA; OFFICER V.  
BECENTI; OFFICER F. CHINO; OFFICER JOSHUA  
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BROWN; OFFICER DAVID COLE; OFFICER  
CHAVEZ; OFFICER SARRACINO; OFFICER  
HAYES; OFFICER DAVID ROBERTS;  
LIEUTENANT JARAMILLO; J. DOES 1–15;  
NATALIE GRINE, in her individual and official  
capacity as Cibola County’s records custodian; ANNA  
MARIE LOPEZ, in her individual and official capacity  
as Cibola County Sheriff’s Office’s records custodian;  
JACOB LEE, in his individual and official capacity as  
records custodian of the Cibola County, Cibola County  
Correctional Center, CoreCivic LLC, CoreCivic of  
Tennessee, LLC, CoreCivic, Inc.; and STRUCK LOVE  
BOJANOWSKI & ACEDO PLC,**

**Defendants.**

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2201 San Pedro NE Building 3 Suite #200  
Albuquerque, NM 87110

CoreCivic, LLC  
C/o Kennedy Moulton & Wells, PC  
2201 San Pedro NE Building 3 Suite #200  
Albuquerque, NM 87110

CoreCivic of Tennessee  
C/o Kennedy Moulton & Wells, PC  
2201 San Pedro NE Building 3 Suite #200  
Albuquerque, NM 87110

Respectfully submitted,

**IVES & FLORES, PA**

/s/ Henry A. Jones

Laura Schauer Ives

Adam C. Flores

Alyssa Quijano

Henry A. Jones

Andrew Pavlides

925 Luna Cir. NW

Albuquerque, NM 87102

(505) 364-3858

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[henry@nmcivilrights.com](mailto:henry@nmcivilrights.com)

[andrew@nmcivilrights.com](mailto:andrew@nmcivilrights.com)

*Attorneys for Plaintiffs*

FILED 1st JUDICIAL DISTRICT COURT  
Santa Fe County  
11/26/2024 10:44 AM  
KATHLEEN VIGIL CLERK OF THE COURT  
Mayra Mendoza-Gutierrez

**STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT COURT**

**JOLEEN YOUNGERS, as personal  
representative of the ESTATE OF  
JASMINE WILLIAMS; TONYA  
PETRIDES; and TONYA PETRIDES as  
next friend of M.R.,**

**Plaintiffs,**

**vs.**

**No. D-101-CV-2024-02751**

**CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC  
OF TENNESSEE, LLC; ROBERT NILIUS; WILLIAM  
SNODGRASS; OFFICER DEHIYA; OFFICER V.  
BECENTI; OFFICER F. CHINO; OFFICER JOSHUA  
ARAGON; OFFICER L. KENNETH; OFFICER K.  
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LIEUTENANT JARAMILLO; J. DOES 1–15;  
NATALIE GRINE, in her individual and official  
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MARIE LOPEZ, in her individual and official capacity  
as Cibola County Sheriff’s Office’s records custodian;  
JACOB LEE, in his individual and official capacity as  
records custodian of the Cibola County, Cibola County  
Correctional Center, CoreCivic LLC, CoreCivic of  
Tennessee, LLC, CoreCivic, Inc.; and STRUCK LOVE  
BOJANOWSKI & ACEDO PLC,**

**Defendants.**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that Plaintiffs served a copy of the Complaint for Wrongful Death, Spoliation of Evidence, and IPRA Violations; a summons; Plaintiff’s First Set of Interrogatories to Defendant Jacob Lee, and a copy of this certificate of service via USPS First Class Certified Mail on November 26, 2024, to the following defendant:



Jacob Lee  
C/O Struck Love Bojanowski & Acedo PLC  
3100 West Ray Road, Suite 300  
Chandler, AZ 85226

Respectfully submitted,

**IVES & FLORES, PA**

/s/ **Henry A. Jones**

Laura Schauer Ives

Adam C. Flores

Alyssa Quijano

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Andrew Pavlides

925 Luna Cir. NW

Albuquerque, NM 87102

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[henry@nmcivilrights.com](mailto:henry@nmcivilrights.com)

[andrew@nmcivilrights.com](mailto:andrew@nmcivilrights.com)

*Attorneys for Plaintiffs*

FILED 1st JUDICIAL DISTRICT COURT  
Santa Fe County  
12/3/2024 2:03 PM  
KATHLEEN VIGIL CLERK OF THE COURT  
Jessica E Castaneda

SUMMONS	
<b>STATE OF NEW MEXICO</b> <b>COUNTY OF SANTA FE</b> <b>FIRST JUDICIAL DISTRICT</b> <b>225 Montezuma Ave</b> <b>Santa Fe, NM 87501</b> <b>Phone: (505) 455-8250</b>	<b>Case Number:</b> <b>D-101-CV-2024-02751</b> <b>Assigned Judge:</b> <b>Honorable Kathleen McGarry</b> <b>Ellenwood</b>
<b>Plaintiff(s):</b>  <b>JOLEEN YOUNGERS, as personal representative of the ESTATE OF JASMINE WILLIAMS; TONYA PETRIDES; and TONYA PETRIDES as next friend of M.R.,</b>  <b>v.</b>  <b>CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC OF TENNESSEE, LLC; ROBERT NILIUS; WILLIAM SNODGRASS; OFFICER DEHIYA; OFFICER V. BECENTI; OFFICER F. CHINO; OFFICER JOSHUA ARAGON; OFFICER L. KENNETH; OFFICER K. BROWN; OFFICER DAVID COLE; OFFICER CHAVEZ; OFFICER SARRACINO; OFFICER HAYES; OFFICER DAVID ROBERTS; LIEUTENANT JARAMILLO; J. DOES 1-15; NATALIE GRINE, in her individual and official capacity as Cibola County's records custodian; ANNA MARIE LOPEZ, in her individual and official capacity as Cibola County Sheriff's Office's records custodian; JACOB LEE, in his individual and official capacity as records custodian of the Cibola County, Cibola County Correctional Center, CoreCivic LLC, CoreCivic of Tennessee, LLC, CoreCivic, Inc.; and STRUCK LOVE BOJANOWSKI &amp; ACEDO PLC,</b>  <b>Defendant(s):</b>	<b>Defendant</b>  <b>CORECIVIC OF TENNESSEE, LLC</b>

**TO THE ABOVE NAMED DEFENDANT(S):** Take notice that

1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date

you are considered served with the Summons is determined by Rule 1-004 NMRA) The Courts address is listed above.

3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.

4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.

5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.

6. If you need an interpreter, you must ask for one in writing.

7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at [www.nmbar.org](http://www.nmbar.org); 1-800-876-6657; or 1-505-797-6066.

Dated at Santa Fe, New Mexico, this 18th day of November, 2024.

Kathleen Vigil

CLERK OF DISTRICT COURT

By: Michael Sener  
Deputy



/s/ Laura Schauer Ives

Laura Schauer Ives

Adam C. Flores

Alyssa D. Quijano

Henry A. Jones

Andrew J. Pavlides

*Attorneys for Plaintiff*

IVES & FLORES, PA

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[alyssa.q@nmcivilrights.com](mailto:alyssa.q@nmcivilrights.com)

[henry@nmcivilrights.com](mailto:henry@nmcivilrights.com)

[andrew@nmcivilrights.com](mailto:andrew@nmcivilrights.com)

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO  
RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

RETURN<sup>1</sup>

STATE OF NEW MEXICO )  
 ) ss  
COUNTY OF Bernalillo )

I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in Bernalillo County on the 24 day of November, 2024 by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

(Check one box and fill in appropriate blanks)

☐ to the defendant \_\_\_\_\_ (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)

☐ to the defendant by [mail] [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service).

After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

☐ to \_\_\_\_\_, a person over fifteen (15) years of age and residing at the usual place of abode of defendant \_\_\_\_\_, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address) a copy of the summons and complaint.

☐ to \_\_\_\_\_, the person apparently in charge at the actual place of business or employment of the defendant and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's business address) and by mailing the summons and complaint by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address).

☐ to Kennedy Moulton + Wells, an agent authorized to receive service of process for defendant Corcoran & Tennessee via certified mail - 2201 San Pedro NE Bldg 3, Ste 200, Albuquerque, NM 87110

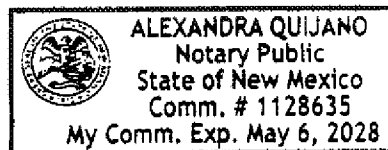
☐ to \_\_\_\_\_, [parent] [guardian] [custodian] [conservator] [guardian ad litem] of defendant \_\_\_\_\_ (used when defendant is a minor or an incompetent person).

☐ to \_\_\_\_\_ (name of person), \_\_\_\_\_, (title of person authorized to receive service. Use this alternative when the defendant is a corporation or an association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision).

Fees: 0

Sylvia Aguirre  
Signature of person making service

Paralegal  
Title (if any)



Subscribed and sworn to before me this 3 day of December, 2024.<sup>2</sup>

alub

Judge, ~~notary~~ or other officer  
authorized to administer oaths

Notary Public  
Official title

USE NOTE

1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.

2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

[Adopted effective August 1, 1988; as amended by Supreme Court Order 05-8300-01, effective March 1, 2005; by Supreme Court Order 07-8300-16, effective August 1, 2007; by Supreme Court Order No. 12-8300-026, effective for all cases filed or pending on or after January 7, 2013.]

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION OF DELIVERY
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Core Clinic of Tennessee, LLC            410 Kennedy Moulton &amp; Wells            2201 San Pedro NE Bldg 3            Albuquerque, NM 87110</p> <p>2. Barcode</p> <p>9590 9402 8754 3310 7345 71</p> <p>3. Insurance (Transfer from service label)</p> <p>7589 0710 5270 0408 4410 20</p> <p>Form 3811, July 2020 PSN 7530-02-000-9053</p>	<p>A. Signature</p> <p>X <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Recipient's (Printed Name)</p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No            If YES, enter delivery address below:</p> <p>5. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™  <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery  <input type="checkbox"/> Certified Mail Restricted Delivery <input checked="" type="checkbox"/> Signature Confirmation™  <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery  <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>

Domestic Return Receipt

<p>USPS TRACKING#</p> <p>ALBUQUERQUE NM 870</p> <p>25 JUN 2024 PM 4:11</p> <p>9590 9402 8754 3310 7345 71</p> <p>United States Postal Service</p>	<p>First-Class Mail</p> <p>Postage &amp; Fees Paid</p> <p>USPS</p> <p>Permit No. G-10</p>
<p>* Sender: Please print your name, address, and ZIP+4® in this box*</p> <p>IVES &amp; FLORES, PA.            925 LUNA CIRCLE NW            ALBUQUERQUE, NM 87102</p> <p>J.W.</p>	





12/3/24, 10:29 AM

USPS.com® - USPS Tracking® Results

ALERT: EFFECTIVE NOVEMBER 29, 2024, INTERNATIONAL MAIL SERVICE TO CANADA IS TEMPORARILY SUSPENDED, DUE TO THE STRIKE OF THE CANADIAN UNION OF POSTAL WORKERS. [READ MORE](#) - (HTTPS...

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### Latest Update

Your item was delivered to an individual at the address at 11:05 am on November 26, 2024 in ALBUQUERQUE, NM 87110.

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### Delivered

Delivered, Left with Individual  
ALBUQUERQUE, NM 87110  
November 26, 2024, 11:05 am

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What Do USPS Tracking Statuses Mean? (<https://faq.usps.com/a/article/Where-is-my-package>)

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## Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)

Feedback

FILED 1st JUDICIAL DISTRICT COURT

Santa Fe County

12/3/2024 2:03 PM

KATHLEEN VIGIL CLERK OF THE COURT

Jessica E Castaneda

SUMMONS Return	
<b>STATE OF NEW MEXICO</b> <b>COUNTY OF SANTA FE</b> <b>FIRST JUDICIAL DISTRICT</b> <b>225 Montezuma Ave</b> <b>Santa Fe, NM 87501</b> <b>Phone: (505) 455-8250</b>	<b>Case Number:</b> <b>D-101-CV-2024-02751</b> <b>Assigned Judge:</b> <b>Honorable Kathleen McGarry</b> <b>Ellenwood</b>
<b>Plaintiff(s):</b>  <b>JOLEEN YOUNGERS, as personal representative of the ESTATE OF JASMINE WILLIAMS; TONYA PETRIDES; and TONYA PETRIDES as next friend of M.R.,</b>  <b>v.</b>  <b>CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC OF TENNESSEE, LLC; ROBERT NILIUS; WILLIAM SNODGRASS; OFFICER DEHIYA; OFFICER V. BECENTI; OFFICER F. CHINO; OFFICER JOSHUA ARAGON; OFFICER L. KENNETH; OFFICER K. BROWN; OFFICER DAVID COLE; OFFICER CHAVEZ; OFFICER SARRACINO; OFFICER HAYES; OFFICER DAVID ROBERTS; LIEUTENANT JARAMILLO; J. DOES 1-15; NATALIE GRINE, in her individual and official capacity as Cibola County's records custodian; ANNA MARIE LOPEZ, in her individual and official capacity as Cibola County Sheriff's Office's records custodian; JACOB LEE, in his individual and official capacity as records custodian of the Cibola County, Cibola County Correctional Center, CoreCivic LLC, CoreCivic of Tennessee, LLC, CoreCivic, Inc.; and STRUCK LOVE BOJANOWSKI &amp; ACEDO PLC,</b>  <b>Defendant(s):</b>	<b>Defendant</b>  <b>CORECIVIC, INC.</b>

**TO THE ABOVE NAMED DEFENDANT(S):** Take notice that

1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date

I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in Bernabeillo County on the 26 day of November, 2024 by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

(Check one box and fill in appropriate blanks)

☐ to the defendant \_\_\_\_\_ (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)

to the defendant by [mail] [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service).

After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

☐ to \_\_\_\_\_, a person over fifteen (15) years of age and residing at the usual place of abode of defendant \_\_\_\_\_, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address) a copy of the summons and complaint.

☐ to \_\_\_\_\_, the person apparently in charge at the actual place of business or employment of the defendant and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's business address) and by mailing the summons and complaint by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address).

☐ to Kennedy Moulton + Wells, an agent authorized to receive service of process for defendant Core Clinic Inc. via certified mail - 2201 San Pedro NE, Bldg 3, Ste 200 Albuquerque, NM 87102

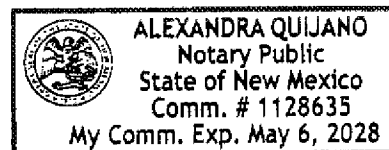
☐ to \_\_\_\_\_, [parent] [guardian] [custodian] [conservator] [guardian ad litem] of defendant \_\_\_\_\_ (used when defendant is a minor or an incompetent person).

☐ to \_\_\_\_\_ (name of person), \_\_\_\_\_, (title of person authorized to receive service. Use this alternative when the defendant is a corporation or an association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision).

Fees:

Sylvia Aguirre  
Signature of person making service

Paralegal  
Title (if any)



Subscribed and sworn to before me this 3 day of December, 2024.<sup>2</sup>

[Signature]

Judge, notary or other officer  
authorized to administer oaths

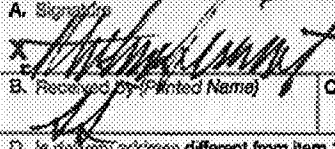
Notary public  
Official title

USE NOTE

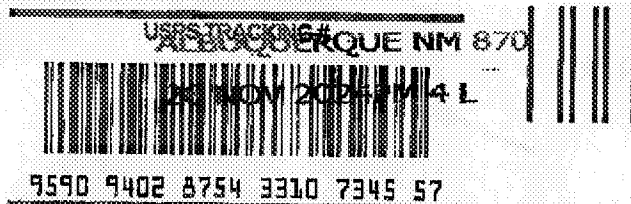
1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.

2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

[Adopted effective August 1, 1988; as amended by Supreme Court Order 05-8300-01, effective March 1, 2005; by Supreme Court Order 07-8300-16, effective August 1, 2007; by Supreme Court Order No. 12-8300-026, effective for all cases filed or pending on or after January 7, 2013.]

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p><b>CoreCivic Inc.</b>  <b>c/o Kennedy Moulton + Wells PC</b>  <b>2201 San Pedro NE Bldg 3 Ste 200</b>  <b>22, NM 87110</b></p>		<p>A. Signature </p> <p>B. Received by (Printed Name) _____</p> <p>C. Date of Delivery _____</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes          If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>2. Article Number (Transfer from service label)</p> <p><b>9589 0710 5270 0408 4410 06</b></p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input checked="" type="checkbox"/> Certified Mail</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p> <p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input checked="" type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>9590 9402 8754 3310 7345 57</p>		<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>	

Domestic Return Receipt



First-Class Mail  
 Postage & Fees Paid  
 USPS  
 Permit No. G-10

9590 9402 8754 3310 7345 57

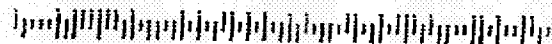
United States  
 Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box\*

IVES & FLORES, PA.  
 925 LUNA CIRCLE NW  
 ALBUQUERQUE, NM 87102

J.W.

-194825





12/3/24, 10:27 AM

USPS.com® - USPS Tracking® Results

ALERT: EFFECTIVE NOVEMBER 26, 2024, INTERNATIONAL MAIL SERVICE TO CANADA IS TEMPORARILY SUSPENDED, DUE TO THE STRIKE OF THE CANADIAN UNION OF POSTAL WORKERS. [READ MORE > \(HTTPS...](#)**USPS Tracking®**[FAQs >](#)

Tracking Number:

[Remove X](#)**9589071052700408441006**[Copy](#)[Add to Informed Delivery \(https://informedelivery.usps.com/\)](https://informedelivery.usps.com/)**Latest Update**

Your item was delivered to an individual at the address at 11:05 am on November 26, 2024 in ALBUQUERQUE, NM 87110.

**Get More Out of USPS Tracking:**

USPS Tracking Plus®

**Delivered****Delivered, Left with Individual**

ALBUQUERQUE, NM 87110

November 26, 2024, 11:05 am

[See All Tracking History](#)[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)[Text & Email Updates](#)[USPS Tracking Plus®](#)[Product Information](#)[See Less ^](#)

Track Another Package

**Need More Help?**

Contact USPS Tracking support for further assistance.

[FAQs](#)

Feedback

FILED 1st JUDICIAL DISTRICT COURT  
Santa Fe County  
12/3/2024 2:03 PM

KATHLEEN VIGIL CLERK OF THE COURT  
Return Jessica E Castaneda

SUMMONS	
<b>STATE OF NEW MEXICO</b> <b>COUNTY OF SANTA FE</b> <b>FIRST JUDICIAL DISTRICT</b> 225 Montezuma Ave Santa Fe, NM 87501 Phone: (505) 455-8250	<b>Case Number:</b> <b>D-101-CV-2024-02751</b> <b>Assigned Judge:</b> <b>Honorable Kathleen McGarry</b> <b>Ellenwood</b>
<b>Plaintiff(s):</b>  <b>JOLEEN YOUNGERS, as personal representative of the ESTATE OF JASMINE WILLIAMS; TONYA PETRIDES; and TONYA PETRIDES as next friend of M.R.,</b>  <b>v.</b>  <b>CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC OF TENNESSEE, LLC; ROBERT NILIUS; WILLIAM SNODGRASS; OFFICER DEHIYA; OFFICER V. BECENTI; OFFICER F. CHINO; OFFICER JOSHUA ARAGON; OFFICER L. KENNETH; OFFICER K. BROWN; OFFICER DAVID COLE; OFFICER CHAVEZ; OFFICER SARRACINO; OFFICER HAYES; OFFICER DAVID ROBERTS; LIEUTENANT JARAMILLO; J. DOES 1-15; NATALIE GRINE, in her individual and official capacity as Cibola County's records custodian; ANNA MARIE LOPEZ, in her individual and official capacity as Cibola County Sheriff's Office's records custodian; JACOB LEE, in his individual and official capacity as records custodian of the Cibola County, Cibola County Correctional Center, CoreCivic LLC, CoreCivic of Tennessee, LLC, CoreCivic, Inc.; and STRUCK LOVE BOJANOWSKI &amp; ACEDO PLC,</b>  <b>Defendant(s):</b>	<b>Defendant</b>  <b>CORECIVIC, LLC</b>

**TO THE ABOVE NAMED DEFENDANT(S):** Take notice that

1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date

you are considered served with the Summons is determined by Rule 1-004 NMRA) The Courts address is listed above.

3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.

4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.

5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.

6. If you need an interpreter, you must ask for one in writing.

7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at [www.nmbar.org](http://www.nmbar.org); 1-800-876-6657; or 1-505-797-6066.

Dated at Santa Fe, New Mexico, this 18th day of November, 2024.

Kathleen Vigil

CLERK OF DISTRICT COURT

By: Michael Sener  
Deputy



/s/ Laura Schauer Ives

Laura Schauer Ives

Adam C. Flores

Alyssa D. Quijano

Henry A. Jones

Andrew J. Pavlides

*Attorneys for Plaintiff*

IVES & FLORES, PA

925 Luna Circle NW

Albuquerque, NM 87102

P: (505) 364-3858 / F: (505) 364-3050

[laura@nmcivilrights.com](mailto:laura@nmcivilrights.com)

[adam@nmcivilrights.com](mailto:adam@nmcivilrights.com)

[alyssa.q@nmcivilrights.com](mailto:alyssa.q@nmcivilrights.com)

[henry@nmcivilrights.com](mailto:henry@nmcivilrights.com)

[andrew@nmcivilrights.com](mailto:andrew@nmcivilrights.com)

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO  
RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

RETURN<sup>1</sup>

STATE OF NEW MEXICO )  
 ) ss  
COUNTY OF Bernalillo )

I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in Bernalillo County on the 26 day of November, 2024 by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

(Check one box and fill in appropriate blanks)

☐ to the defendant \_\_\_\_\_ (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)

☐ to the defendant by [mail] [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service).

After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

☐ to \_\_\_\_\_, a person over fifteen (15) years of age and residing at the usual place of abode of defendant \_\_\_\_\_, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address) a copy of the summons and complaint.

☐ to \_\_\_\_\_, the person apparently in charge at the actual place of business or employment of the defendant and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's business address) and by mailing the summons and complaint by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address).

☐ to Kennedy Moulton Wells agent authorized to receive service of process for defendant Core Cruise LLC via certified mail - 2201 San Pedro Ave NE, Bldg 3, Ste 200, Albuquerque, NM 87110

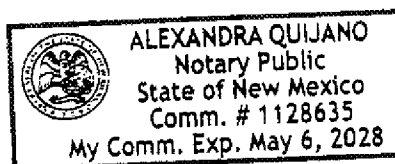
☐ to \_\_\_\_\_, [parent] [guardian] [custodian] [conservator] [guardian ad litem] of defendant \_\_\_\_\_ (used when defendant is a minor or an incompetent person).

☐ to \_\_\_\_\_ (name of person), \_\_\_\_\_, (title of person authorized to receive service. Use this alternative when the defendant is a corporation or an association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision).

Fees:

Sylvia Aguirre  
Signature of person making service

Paralegal  
Title (if any)



Subscribed and sworn to before me this 3 day of December, 2024.<sup>2</sup>

[Signature]

Judge, notary or other officer  
authorized to administer oaths

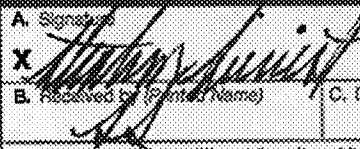
Notary Public  
Official title

USE NOTE

1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.

2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

[Adopted effective August 1, 1988; as amended by Supreme Court Order 05-8300-01, effective March 1, 2005; by Supreme Court Order 07-8300-16, effective August 1, 2007; by Supreme Court Order No. 12-8300-026, effective for all cases filed or pending on or after January 7, 2013.]

SENDER- COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:  Core Clinic LLC  c/o Kennedy Moulton &amp; Wells PC  2201 San Pedro NE Bldg 3 Ste 200  ABQ, NM 87110</p>	<p>A. Signature   <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No  If YES, enter delivery address below:</p>
<p>2. Article Number (Member Item number, below)</p> <p>9590 9402 8754 3310 7345 64</p> <p>9589 0710 5270 0408 4430 13</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input checked="" type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

USPS TRACKING #	First-Class Mail
<p>ALBUQUERQUE, NM 87102</p> <p>26 NOV 2024 4 L</p> <p>9590 9402 8754 3310 7345 64</p>	<p>Postage &amp; Fees Paid</p> <p>USPS</p> <p>Permit No. G-10</p>
<p>United States Postal Service</p>	<p>* Sender: Please print your name, address, and ZIP+4® in this box*</p> <p>IVES &amp; FLORES, PA.  925 LUNA CIRCLE NW  ALBUQUERQUE, NM 87102</p> <p>J.W.</p>

|||||



12/3/24, 10:26 AM

USPS.com® - USPS Tracking® Results

ALERT: EFFECTIVE NOVEMBER 29, 2024, INTERNATIONAL MAIL SERVICE TO CANADA IS TEMPORARILY SUSPENDED, DUE TO THE STRIKE OF THE CANADIAN UNION OF POSTAL WORKERS. [READ MORE: HTTPS...](#)

## USPS Tracking®

[FAQs >](#)

Tracking Number:

Remove X

**9589071052700408441013**[Copy](#) [Add to Informed Delivery \(https://informedelivery.usps.com/\)](https://informedelivery.usps.com/)

## Latest Update

Your item was delivered to an individual at the address at 11:05 am on November 26, 2024 in ALBUQUERQUE, NM 87110.

## Get More Out of USPS Tracking:

USPS Tracking Plus®

## Delivered

Delivered, Left with Individual

ALBUQUERQUE, NM 87110

November 26, 2024, 11:05 am

[See All Tracking History](#)[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)

## Text &amp; Email Updates



## USPS Tracking Plus®



## Product Information

[See Less ^](#)

Track Another Package

## Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)

Feedback

SUMMONS	
<b>STATE OF NEW MEXICO</b> <b>COUNTY OF SANTA FE</b> <b>FIRST JUDICIAL DISTRICT</b> <b>225 Montezuma Ave</b> <b>Santa Fe, NM 87501</b> <b>Phone: (505) 455-8250</b>	<b>Case Number:</b> <b>D-101-CV-2024-02751</b> <b>Assigned Judge:</b> <b>Honorable Kathleen McGarry</b> <b>Ellenwood</b>
<b>Plaintiff(s):</b>  <b>JOLEEN YOUNGERS, as personal representative of the ESTATE OF JASMINE WILLIAMS; TONYA PETRIDES; and TONYA PETRIDES as next friend of M.R.,</b>  <b>v.</b>  <b>CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC OF TENNESSEE, LLC; ROBERT NILIUS; WILLIAM SNODGRASS; OFFICER DEHIYA; OFFICER V. BECENTI; OFFICER F. CHINO; OFFICER JOSHUA ARAGON; OFFICER L. KENNETH; OFFICER K. BROWN; OFFICER DAVID COLE; OFFICER CHAVEZ; OFFICER SARRACINO; OFFICER HAYES; OFFICER DAVID ROBERTS; LIEUTENANT JARAMILLO; J. DOES 1-15; NATALIE GRINE, in her individual and official capacity as Cibola County's records custodian; ANNA MARIE LOPEZ, in her individual and official capacity as Cibola County Sheriff's Office's records custodian; JACOB LEE, in his individual and official capacity as records custodian of the Cibola County, Cibola County Correctional Center, CoreCivic LLC, CoreCivic of Tennessee, LLC, CoreCivic, Inc.; and STRUCK LOVE BOJANOWSKI &amp; ACEDO PLC,</b>  <b>Defendant(s):</b>	<b>Defendant</b>  <b>ANNA MARIE LOPEZ, in her individual and official capacity as Cibola County Sheriff's Office's records custodian</b>

**TO THE ABOVE NAMED DEFENDANT(S):** Take notice that

1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date

you are considered served with the Summons is determined by Rule 1-004 NMRA) The Courts address is listed above.

3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.

4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.

5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.

6. If you need an interpreter, you must ask for one in writing.

7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at [www.nmbar.org](http://www.nmbar.org); 1-800-876-6657; or 1-505-797-6066.

Dated at Santa Fe, New Mexico, this 18th day of November, 2024.

Kathleen Vigil

CLERK OF DISTRICT COURT

By: Michael Sesea  
Deputy



/s/ Laura Schauer Ives

Laura Schauer Ives

Adam C. Flores

Alyssa D. Quijano

Henry A. Jones

Andrew J. Pavlides

*Attorneys for Plaintiff*

IVES & FLORES, PA

925 Luna Circle NW

Albuquerque, NM 87102

P: (505) 364-3858 / F: (505) 364-3050

[laura@nmcivilrights.com](mailto:laura@nmcivilrights.com)

[adam@nmcivilrights.com](mailto:adam@nmcivilrights.com)

[alyssa.q@nmcivilrights.com](mailto:alyssa.q@nmcivilrights.com)

[henry@nmcivilrights.com](mailto:henry@nmcivilrights.com)

[andrew@nmcivilrights.com](mailto:andrew@nmcivilrights.com)

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO  
RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

RETURN<sup>1</sup>

STATE OF NEW MEXICO                    )  
  ) ss  
COUNTY OF Bernalillo                    )

I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in Cibola County on the 4th day of December, 2024 by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

**(Check one box and fill in appropriate blanks)**

☐ to the defendant \_\_\_\_\_ (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)

☒ to the defendant by ~~mail~~ [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service). *via certified mail to.*  
700 E. Roosevelt Ste 50, Grants, NM 87020

After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

☐ to \_\_\_\_\_, a person over fifteen (15) years of age and residing at the usual place of abode of defendant \_\_\_\_\_, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address) a copy of the summons and complaint.

☐ to \_\_\_\_\_, the person apparently in charge at the actual place of business or employment of the defendant and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's business address) and by mailing the summons and complaint by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address).

☐ to \_\_\_\_\_, an agent authorized to receive service of process for defendant \_\_\_\_\_.

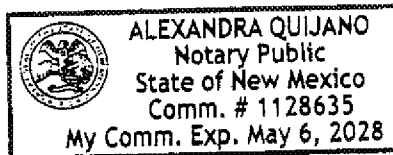
☐ to \_\_\_\_\_, [parent] [guardian] [custodian] [conservator] [guardian ad litem] of defendant \_\_\_\_\_ (used when defendant is a minor or an incompetent person).

☐ to \_\_\_\_\_ (name of person), \_\_\_\_\_, (title of person authorized to receive service. Use this alternative when the defendant is a corporation or an association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision).

Fees: \_\_\_\_\_

*Sylvia Aguirre*  
 Signature of person making service

*Paralegal*  
 Title (if any)



Subscribed and sworn to before me this 6 day of December, 2024.<sup>2</sup>

*[Signature]*

Judge, notary or other officer  
authorized to administer oaths


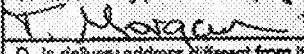
Notary Public  
Official title

USE NOTE

1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.

2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

[Adopted effective August 1, 1988; as amended by Supreme Court Order 05-8300-01, effective March 1, 2005; by Supreme Court Order 07-8300-16, effective August 1, 2007; by Supreme Court Order No. 12-8300-026, effective for all cases filed or pending on or after January 7, 2013.]

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature   <input type="checkbox"/> Agent  <input checked="" type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:            Anna Marie Lopez            700 E. Roosevelt Ave Ste 50            Grants, NM            87020</p>		<p>B. Received by (Printed Name)   </p> <p>C. Date of Delivery            12/24</p>	
<p>2. Article Number (Transfer from service label)            9589 0710 5270 0408 4411 50</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes            If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type  <input type="checkbox"/> Adult Signature  <input type="checkbox"/> Adult Signature Restricted Delivery  <input type="checkbox"/> Certified Mail®  <input type="checkbox"/> Certified Mail Restricted Delivery  <input type="checkbox"/> Collect on Delivery  <input type="checkbox"/> Collect on Delivery Restricted Delivery  <input type="checkbox"/> Insured Mail  <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p><input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Registered Mail™  <input type="checkbox"/> Registered Mail Restricted Delivery  <input type="checkbox"/> Signature Confirmation™  <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>9590 9402 8754 3310 7347 00</p>		<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>	

Domestic Return Receipt



First-Class Mail  
 Postage & Fees Paid  
 USPS  
 Permit No. G-10

United States  
 Postal Service

\* Sender: Please print your name, address, and ZIP+4® in this box\*

IVES & FLORES, PA.  
 925 LUNA CIRCLE NW  
 ALBUQUERQUE, NM 87102

J.W.





FILED 1st JUDICIAL DISTRICT COURT  
Santa Fe County  
12/6/2024 1:48 PM  
KATHLEEN VIGIL CLERK OF THE COURT  
Jacqueline Rosales Juarez

<b>SUMMONS</b>	
<b>STATE OF NEW MEXICO</b> <b>COUNTY OF SANTA FE</b> <b>FIRST JUDICIAL DISTRICT</b> 225 Montezuma Ave Santa Fe, NM 87501 Phone: (505) 455-8250	<b>Case Number:</b> <b>D-101-CV-2024-02751</b> <b>Assigned Judge:</b> <b>Honorable Kathleen McGarry</b> Ellenwood
<b>Plaintiff(s):</b>  <b>JOLEEN YOUNGERS, as personal representative of the ESTATE OF JASMINE WILLIAMS; TONYA PETRIDES; and TONYA PETRIDES as next friend of M.R.,</b>  v.  <b>CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC OF TENNESSEE, LLC; ROBERT NILIUS; WILLIAM SNODGRASS; OFFICER DEHIYA; OFFICER V. BECENTI; OFFICER F. CHINO; OFFICER JOSHUA ARAGON; OFFICER L. KENNETH; OFFICER K. BROWN; OFFICER DAVID COLE; OFFICER CHAVEZ; OFFICER SARRACINO; OFFICER HAYES; OFFICER DAVID ROBERTS; LIEUTENANT JARAMILLO; J. DOES 1-15; NATALIE GRINE, in her individual and official capacity as Cibola County's records custodian; ANNA MARIE LOPEZ, in her individual and official capacity as Cibola County Sheriff's Office's records custodian; JACOB LEE, in his individual and official capacity as records custodian of the Cibola County, Cibola County Correctional Center, CoreCivic LLC, CoreCivic of Tennessee, LLC, CoreCivic, Inc.; and STRUCK LOVE BOJANOWSKI &amp; ACEDO PLC,</b>  <b>Defendant(s):</b>	<b>Defendant</b>  <b>NATALIE GRINE, in her individual and official capacity as Cibola County's records custodian</b>

**TO THE ABOVE NAMED DEFENDANT(S):** Take notice that

1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date



(Check one box and fill in appropriate blanks)

☐ to the defendant \_\_\_\_\_ (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)

☒ to the defendant by (mail) [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service). via certified mail to:  
700 E. Roosevelt Ste 50, Grants NM 87020

After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

☐ to \_\_\_\_\_, a person over fifteen (15) years of age and residing at the usual place of abode of defendant \_\_\_\_\_, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address) a copy of the summons and complaint.

☐ to \_\_\_\_\_, the person apparently in charge at the actual place of business or employment of the defendant and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's business address) and by mailing the summons and complaint by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address).

☐ to \_\_\_\_\_, an agent authorized to receive service of process for defendant \_\_\_\_\_.

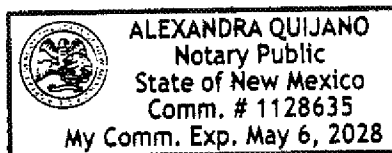
☐ to \_\_\_\_\_, [parent] [guardian] [custodian] [conservator] [guardian ad litem] of defendant \_\_\_\_\_ (used when defendant is a minor or an incompetent person).

☐ to \_\_\_\_\_ (name of person), \_\_\_\_\_ (title of person authorized to receive service. Use this alternative when the defendant is a corporation or an association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision).

Fees: \_\_\_\_\_

Sylvia Aguirre  
 Signature of person making service

Paralegal  
 Title (if any)



Subscribed and sworn to before me this 16 day of December, 2024.<sup>2</sup>

[Signature]

Judge, notary or other officer  
authorized to administer oaths

Notary Public  
Official title

USE NOTE

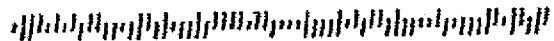
1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.

2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

[Adopted effective August 1, 1988; as amended by Supreme Court Order 05-8300-01, effective March 1, 2005; by Supreme Court Order 07-8300-16, effective August 1, 2007; by Supreme Court Order No. 12-8300-026, effective for all cases filed or pending on or after January 7, 2013.]

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Natalie Grine 700 E. Roosevelt Ste 50 Grants, NM 87020</p> <p>2. Article Number (Transfer from carrier label) 9589 0710 5270 0408 4411 67</p>		<p>A. Signature X <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) T. Morgan</p> <p>C. Date of Delivery 12-4-24</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input checked="" type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input checked="" type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>9590 9402 8754 3310 7347 17</p>			
PS Form 3811, July 2020 PSN 7530-02-000-9053		Domestic Return Receipt	

<p>USPS TRACKING#</p> <p>ALBUQUERQUE NM 870</p> <p>DEC 2024 PM 2 L</p> <p>9590 9402 8754 3310 7347 17</p> <p>United States Postal Service</p>	<p>First-Class Mail Postage &amp; Fees Paid USPS Permit No. G-10</p>
<p>• Sender: Please print your name, address, and ZIP+4® in this box*</p> <p>IVES &amp; FLORES, PA. 925 LUNA CIRCLE NW ALBUQUERQUE, NM 87102</p> <p>J.W.</p>	



FILED 1st JUDICIAL DISTRICT COURT

Santa Fe County

12/9/2024 10:53 AM

KATHLEEN VIGIL CLERK OF THE COURT

Jessica E Castaneda

Return

**SUMMONS**

<b>STATE OF NEW MEXICO</b> <b>COUNTY OF SANTA FE</b> <b>FIRST JUDICIAL DISTRICT</b> <b>225 Montezuma Ave</b> <b>Santa Fe, NM 87501</b> <b>Phone: (505) 455-8250</b>	<b>Case Number:</b> <b>D-101-CV-2024-02751</b> <b>Assigned Judge:</b> <b>Honorable Kathleen McGarry</b> <b>Ellenwood</b>
<b>Plaintiff(s):</b>  <b>JOLEEN YOUNGERS, as personal representative of the ESTATE OF JASMINE WILLIAMS; TONYA PETRIDES; and TONYA PETRIDES as next friend of M.R.,</b>  <b>v.</b>  <b>CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC OF TENNESSEE, LLC; ROBERT NILIUS; WILLIAM SNODGRASS; OFFICER DEHIYA; OFFICER V. BECENTI; OFFICER F. CHINO; OFFICER JOSHUA ARAGON; OFFICER L. KENNETH; OFFICER K. BROWN; OFFICER DAVID COLE; OFFICER CHAVEZ; OFFICER SARRACINO; OFFICER HAYES; OFFICER DAVID ROBERTS; LIEUTENANT JARAMILLO; J. DOES 1-15; NATALIE GRINE, in her individual and official capacity as Cibola County's records custodian; ANNA MARIE LOPEZ, in her individual and official capacity as Cibola County Sheriff's Office's records custodian; JACOB LEE, in his individual and official capacity as records custodian of the Cibola County, Cibola County Correctional Center, CoreCivic LLC, CoreCivic of Tennessee, LLC, CoreCivic, Inc.; and STRUCK LOVE BOJANOWSKI &amp; ACEDO PLC,</b>  <b>Defendant(s):</b>	<b>Defendant</b>  <b>JACOB LEE, in his individual and official capacity as records custodian of the Cibola County, Cibola County Correctional Center, CoreCivic LLC, CoreCivic of Tennessee, LLC, CoreCivic, Inc.</b>

**TO THE ABOVE NAMED DEFENDANT(S):** Take notice that

1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date





(Check one box and fill in appropriate blanks)

☐ to the defendant \_\_\_\_\_ (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)

☒ to the defendant by [mail] [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service). Via certified mail to: Struck Love Espinowski + Acedo PLLC, 3100 West Ray Rd Ste 300 Chandler, AZ 85226

After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

☐ to \_\_\_\_\_, a person over fifteen (15) years of age and residing at the usual place of abode of defendant \_\_\_\_\_, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address) a copy of the summons and complaint.

☐ to \_\_\_\_\_, the person apparently in charge at the actual place of business or employment of the defendant and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's business address) and by mailing the summons and complaint by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address).

☐ to \_\_\_\_\_, an agent authorized to receive service of process for defendant \_\_\_\_\_.

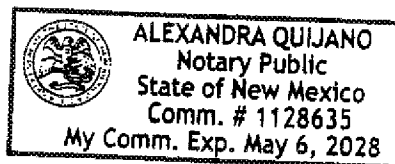
☐ to \_\_\_\_\_, [parent] [guardian] [custodian] [conservator] [guardian ad litem] of defendant \_\_\_\_\_ (used when defendant is a minor or an incompetent person).

☐ to \_\_\_\_\_ (name of person), \_\_\_\_\_, (title of person authorized to receive service. Use this alternative when the defendant is a corporation or an association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision).

Fees: 0

Sylvia Aguero  
Signature of person making service

Paralegal  
Title (if any)



Subscribed and sworn to before me this 9 day of December, 2024.<sup>2</sup>

[Signature]

Judge, notary or other officer  
authorized to administer oaths

Notary Public  
Official title

USE NOTE

1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.

2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

[Adopted effective August 1, 1988; as amended by Supreme Court Order 05-8300-01, effective March 1, 2005; by Supreme Court Order 07-8300-16, effective August 1, 2007; by Supreme Court Order No. 12-8300-026, effective for all cases filed or pending on or after January 7, 2013.]

**PS Form 3811**

SELECT: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  </p> <p>B. Received by (Printed Name)            _____</p> <p>C. Date of Delivery            11/2/21</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes            If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>
<p>1. Article Addressed to:  <b>Jacob Lee</b>  <b>c/o Struck Love Boychowski + Acsalo</b>  <b>3100 West Ray Road Ste 300</b>  <b>Chandler, AZ 85226</b></p>	
 9590 9402 8754 3310 7346 87	
<p>2. Article Number (Transfer from service label)</p> <p><b>7589 0710 5270 0408 4411 36</b></p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery</p> <p><input type="checkbox"/> Over \$500</p>	<p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restrict Delivery</p> <p><input type="checkbox"/> Signature Confirmation</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

FILED 1st JUDICIAL DISTRICT COURT  
Santa Fe County  
12/9/2024 10:53 AM

KATHLEEN VIGIL CLERK OF THE COURT

Jessica E Castaneda

SUMMONS Return	
<b>STATE OF NEW MEXICO</b> <b>COUNTY OF SANTA FE</b> <b>FIRST JUDICIAL DISTRICT</b> <b>225 Montezuma Ave</b> <b>Santa Fe, NM 87501</b> <b>Phone: (505) 455-8250</b>	<b>Case Number:</b> <b>D-101-CV-2024-02751</b> <b>Assigned Judge:</b> <b>Honorable Kathleen McGarry</b> <b>Ellenwood</b>
<b>Plaintiff(s):</b>  <b>JOLEEN YOUNGERS, as personal representative of the ESTATE OF JASMINE WILLIAMS; TONYA PETRIDES; and TONYA PETRIDES as next friend of M.R.,</b>  <b>v.</b>  <b>CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC OF TENNESSEE, LLC; ROBERT NILIUS; WILLIAM SNODGRASS; OFFICER DEHIYA; OFFICER V. BECENTI; OFFICER F. CHINO; OFFICER JOSHUA ARAGON; OFFICER L. KENNETH; OFFICER K. BROWN; OFFICER DAVID COLE; OFFICER CHAVEZ; OFFICER SARRACINO; OFFICER HAYES; OFFICER DAVID ROBERTS; LIEUTENANT JARAMILLO; J. DOES 1-15; NATALIE GRINE, in her individual and official capacity as Cibola County's records custodian; ANNA MARIE LOPEZ, in her individual and official capacity as Cibola County Sheriff's Office's records custodian; JACOB LEE, in his individual and official capacity as records custodian of the Cibola County, Cibola County Correctional Center, CoreCivic LLC, CoreCivic of Tennessee, LLC, CoreCivic, Inc.; and STRUCK LOVE BOJANOWSKI &amp; ACEDO PLC,</b>  <b>Defendant(s):</b>	<b>Defendant</b>  <b>STRUCK LOVE BOJANOWSKI &amp; ACEDO PLC</b>

**TO THE ABOVE NAMED DEFENDANT(S):** Take notice that

1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date

you are considered served with the Summons is determined by Rule 1-004 NMRA) The Courts address is listed above.

3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.

4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.

5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.

6. If you need an interpreter, you must ask for one in writing.

7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at [www.nmbar.org](http://www.nmbar.org); 1-800-876-6657; or 1-505-797-6066.

Dated at Santa Fe, New Mexico, this 18th day of November, 2024.

Kathleen Vigil

CLERK OF DISTRICT COURT

By: Michael Sener  
Deputy



/s/ Laura Schauer Ives

Laura Schauer Ives

Adam C. Flores

Alyssa D. Quijano

Henry A. Jones

Andrew J. Pavlides

*Attorneys for Plaintiff*

IVES & FLORES, PA

925 Luna Circle NW

Albuquerque, NM 87102

P: (505) 364-3858 / F: (505) 364-3050

[laura@nmcivilrights.com](mailto:laura@nmcivilrights.com)

[adam@nmcivilrights.com](mailto:adam@nmcivilrights.com)

[alyssa.q@nmcivilrights.com](mailto:alyssa.q@nmcivilrights.com)

[henry@nmcivilrights.com](mailto:henry@nmcivilrights.com)

[andrew@nmcivilrights.com](mailto:andrew@nmcivilrights.com)

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO  
RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

RETURN<sup>1</sup>

STATE OF NEW MEXICO )  
 ) ss  
COUNTY OF Bernalillo )

I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in Manosopa County on the 2nd day of December, 2024, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

(Check one box and fill in appropriate blanks)

☐ to the defendant \_\_\_\_\_ (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)

☒ to the defendant by (mail) [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service). Via certified mail to:  
Struck Love Bojanowski + Acedo PLLC, 3100 West Ray Rd. Ste 300  
Chandler, AZ 85226  
 After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:

☐ to \_\_\_\_\_, a person over fifteen (15) years of age and residing at the usual place of abode of defendant \_\_\_\_\_, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address) a copy of the summons and complaint.

☐ to \_\_\_\_\_, the person apparently in charge at the actual place of business or employment of the defendant and by mailing by first class mail to the defendant at \_\_\_\_\_ (insert defendant's business address) and by mailing the summons and complaint by first class mail to the defendant at \_\_\_\_\_ (insert defendant's last known mailing address).

☐ to \_\_\_\_\_, an agent authorized to receive service of process for defendant \_\_\_\_\_.

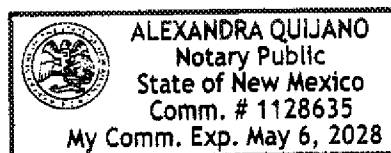
☐ to \_\_\_\_\_, [parent] [guardian] [custodian] [conservator] [guardian ad litem] of defendant \_\_\_\_\_ (used when defendant is a minor or an incompetent person).

☐ to \_\_\_\_\_ (name of person), \_\_\_\_\_, (title of person authorized to receive service. Use this alternative when the defendant is a corporation or an association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision).

Fees: 0

Sofia Aguirre  
 Signature of person making service

Paralegal  
 Title (if any)



Subscribed and sworn to before me this 12<sup>th</sup> day of December, 2024.<sup>2</sup>

alala27

Judge, ~~notary~~ or other officer  
authorized to administer oaths

Notary Public  
Official title


USE NOTE

1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.

2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

[Adopted effective August 1, 1988; as amended by Supreme Court Order 05-8300-01, effective March 1, 2005; by Supreme Court Order 07-8300-16, effective August 1, 2007; by Supreme Court Order No. 12-8300-026, effective for all cases filed or pending on or after January 7, 2013.]



SENDER: COMPLETE THIS SECTION	COMPLETER: COMPLETE THIS SECTION ON DELIVERY
<p>Complete items 1, 2, and 3.</p> <p>Print your name and address on the reverse so that we can return the card to you.</p> <p>Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:  <b>Struck Love Bogowski +</b>  <b>Acedo PLC</b>  <b>3100 West Ray Rd Ste 300</b>  <b>Chandler, AZ</b>  <b>87224</b></p> <p>2. Article Number (Transfer from service label)  <b>9589 0710 5270 0408 4411 29</b></p>	<p>A. Signature  </p> <p>B. Received by (Printed Name)  <b>[Signature]</b></p> <p>C. Date of Delivery  <b>12/2/24</b></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes          If YES, enter delivery address below: <input checked="" type="checkbox"/> NO</p>
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input checked="" type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input checked="" type="checkbox"/> Signature Confirmation</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input checked="" type="checkbox"/> Signature Confirmation</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	<p>Barcode: 9590 9402 8754 3310 7345 95</p> <p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>

USPS TRACKING#	
<p>Barcode: 9590 9402 8754 3310 7345 95</p> <p>United States Postal Service</p>	<p>First-Class Postage &amp; USPS Permit No. G</p> <p>• Sender: Please print your name, address, and ZIP+4® in this box*</p> <p><b>IVES &amp; FLORES, PA.</b>  <b>925 LUNA CIRCLE NW</b>  <b>ALBUQUERQUE, NM 87102</b></p> <p><b>J.W.</b></p>

**EXHIBIT B**

**EXHIBIT B**

**STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT**

**JOLEEN YOUNGERS, as personal representative of  
the ESTATE OF JASMINE WILLIAMS; TONYA  
PETRIDES; and TONYA PETRIDES as next friend of  
M.R.,**

**Plaintiffs,**

**vs.**

**CORECIVIC, INC.; CORECIVIC, LLC;  
CORECIVIC OF TENNESSEE, LLC; ROBERT  
NILIUS; WILLIAM SNODGRASS; OFFICER  
DEHIYA; OFFICER V. BECENTI; OFFICER F.  
CHINO; OFFICER JOSHUA ARAGON; OFFICER  
L. KENNETH; OFFICER K. BROWN; OFFICER  
DAVID COLE; OFFICER CHAVEZ; OFFICER  
SARRACINO; OFFICER HAYES; OFFICER  
DAVID ROBERTS; LIEUTENANT JARAMILLO; J.  
DOES 1-15; NATALIE GRINE, in her individual and  
official capacity as Cibola County's records custodian;  
ANNA MARIE LOPEZ, in her individual and official  
capacity as Cibola County Sheriff's Office's records  
custodian; JACOB LEE, in his individual and official  
capacity as records custodian of the Cibola County,  
Cibola County Correctional Center, CoreCivic LLC,  
CoreCivic of Tennessee, LLC, CoreCivic, Inc.; and  
STRUCK LOVE BOJANOWSKI & ACEDO PLC,**

**Defendants.**

**CASE NO. D-101-CV-2020-02549**

**NOTICE OF FILING NOTICE OF REMOVAL**

Defendants CoreCivic, Inc., CoreCivic, LLC, CoreCivic of Tennessee, LLC (“CoreCivic Defendants”), Struck Love Bojanowski & Acedo, PLC, and Jacob Lee (“SLBA Defendants”) (collectively, “Removing Defendants”) through undersigned counsel and pursuant to 28 U.S.C. §

1442(a)(1), notify this Court that they filed a Notice of Removal of this action to the United States District Court for the District of New Mexico.

A copy of the Notice of Removal (exclusive of exhibits) is attached as Exhibit A.

Dated: January 6, 2025

/s/ Jacob B. Lee

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*Attorneys for Defendants CoreCivic, Inc, CoreCivic, LLC, CoreCivic of Tennessee, LLC, Struck Love Bojanowski & Acedo, PLC, and Jacob Lee*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 6, 2025, I electronically transmitted the attached document to the Clerk's Office using Odyssey File & Serve E-Filing System for filing and transmittal of a Notice of Electronic Filing to the parties entitled to receive this document via Odyssey File & Serve registrant:

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/s/ \_\_\_\_\_